

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF MICHIGAN - NORTHERN DIVISION**

In the Matter of:

HELENA BELL-GRIFFEN

Debtor
_____ /

**CHAPTER 13 PROCEEDING
CASE NUMBER: 21-20595
HONORABLE DANIEL S. OPPERMAN**

OBJECTION TO CONFIRMATION OF CHAPTER 13 PLAN

NOW COMES Thomas W. McDonald, Jr., Chapter 13 Trustee, and hereby objects to the debtor's Chapter 13 Plan as follows:

(1) The debtor has failed to file her 2015, 2016, 2017, 2018, 2019 and 2020 Federal income tax returns, per the claim filed by the Internal Revenue Service on June 9, 2021, as required by 11 U.S.C. §1308.

(2) The debtor(s) Chapter 13 plan is not feasible due to the estimated tax claim filed by the Internal Revenue Service. The funding of the plan is not sufficient to pay claims as filed, and there will be no distribution to unsecured creditors.

WHEREFORE, the Chapter 13 Trustee prays this Court deny Confirmation of the proposed Chapter 13 Plan.

Dated: June 17, 2021

/s/Thomas W. McDonald, Jr.
Thomas W. McDonald, Jr. (P32464)
Chapter 13 Trustee
3144 Davenport Avenue
Saginaw, Michigan 48602
Telephone: (989) 792-6766
ecf@mcdonald13.org

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CERTIFICATE OF SERVICE OBJECTION TO CONFIRMATION

I, the undersigned, do hereby certify that on June 17, 2021, I have electronically filed the foregoing papers with the Clerk of the Court using the ECF systems which will send notification to any party registered with the ECF System, and hereby certify that I have mailed by United States Postal Service the Papers to the following non-ECF participants:

Helena Bell-Griffen
905 Bethany Street
Saginaw, Michigan 48601

/s/Jennifer Drzewicki
Jennifer Drzewicki
Office of Thomas W. McDonald, Jr.
Chapter 13 Trustee
3144 Davenport Avenue
Saginaw, Michigan 48602
Telephone: (989) 792-6766
ecf@mcdonald13.org